

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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JANICE LEE, BON HYUB KOO, RYAN  
JUN-MO KOO, HONG SEA LEE, and  
YOON SOON LEE,

Plaintiffs,

v.

DAILY MAIL, SEOUL NEWS, IMBC  
INC., and MBC INC., LEE UN JOO,  
NEWS, MUNHWAI.COM, CHANNEL A  
INC., SPORTALL KOREA, K-  
AMERICAN POST, YTN NEWS,  
MALAYSIA CHRONICLE,  
PAGESAY.COM, HEADLINES 365,  
JOHN and JANE DOES1-35,

Defendants.

15-CV-

**Complaint with Jury Demand**

Plaintiffs Janice Lee, Bon Hyub Koo, Ryan Jun-Mo Koo, Hong Sea Lee and  
Yoon Soon Lee for their complaint against the above-named defendants state:

**PLAINTIFFS**

1. At all relevant times, plaintiff Janice Lee was and still is a resident and

domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey.

2. Plaintiff Bon Hyub Koo is the husband of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Bon Hyub Koo suffers from loss of consortium and humiliation among others by the acts of the Defendants.

3. Plaintiff Ryan Jun-mo Koo is a minor son of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Ryan Jun-mo Koo suffers from loss of consortium and humiliation among others by the acts of the Defendants.

4. Plaintiff Hong Sea Lee is the father of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Hong Sea Lee suffers from loss of consortium and humiliation among others by the acts and/or omission of the Defendants.

5. Plaintiff Yoon Soon Lee is the mother of Plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Yoon Soon Lee suffers from loss of consortium and humiliation among others by the acts of the Defendants.

#### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over this matter under 28 U.S.C. §1332 as the

amount in controversy between plaintiffs and each defendant exceeds \$75,000.00 exclusive of costs and interest. Venue is proper in this district because significant event arose here including plaintiff Janice Lee's wrongful arrest, incarceration, and injuries of all plaintiffs, due to tortious acts being suffered here.

### **GENERAL ALLEGATIONS**

7. At the relevant times, Janice H. Lee was the mother of an 8 year old son Ryan Jun-mo Koo and wife of Bon Hyub Koo, who all reside with both of her aging parents Hong Sea Lee and Yoon Soon Lee at 286 Shaler Blvd., Ridgefield, New Jersey. Mrs. Lee is a sales account manager for an international seller of wigs and hair products, and has been managing New Jersey accounts and other customers. Plaintiff Janice Lee is an individual of high moral character, completely reputable and honorable, with deep roots in the Korean-American community, a model citizen, never touched illegal drugs and has never engaged in prostitution or the operation of a prostitution ring.

8. Under the guise of news reporting, defendants reported a false story advanced by officials from the State and City of New York and State of New Jersey without fact-checking, without investigation, without interviewing those involved, and with no regard for accuracy.

9. In defendants' purported "news," defendants reported in essence that

plaintiff Janice Lee was a drug dealer; prostitute; organized gang member; and part of a Superbowl drug/prostitution rings that operated systematically during the 2014 Superbowl season.

10. Defendants' articles were wholly and partially materially false. The false statements were statements of fact and not mere opinion or puffery. The statements told defendants' audience that Mrs. Lee is a whore; that she is a drug dealer; that she is part of a gang. Each of these factual statements are defamation per se; the combination of all such factual statements are abject bad faith defamation per se. Defendants' false report has placed plaintiffs in a false, sleazy, criminal light and has harmed their good name and reputation within the Korean-American community and the community at large.

11. Due to each defendant's acts, Janice Lee's immediate family members have been humiliated and otherwise injured along with her. They lived through the experience of having their mother, wife, daughter taken in handcuffs or shackles; locked up and treated like a convicted criminal for a substantial time; and humiliated among millions of readers and all of her community as a criminal; as a prostitute; as a gang member and as part of an organized criminal enterprise.

12. Defendants' conducts were so far below the standard of practice which governs the news media, according to long established principles in the news

reporting profession. Among these, the American Society of Newspaper Editors (ASNE) <http://www.asne.org/kiosk/archive/principi.htm>, states, among other things:

ARTICLE IV - Truth and Accuracy. Good faith with the reader is the foundation of good journalism. Every effort must be made to assure that the news content is accurate, free from bias and in context, and that all sides are presented fairly. Editorials, analytical articles and commentary should be held to the same standards of accuracy with respect to facts as news reports. Significant errors of fact, as well as errors of omission, should be corrected promptly and prominently.

ARTICLE V - Impartiality. To be impartial does not require the press to be unquestioning or to refrain from editorial expression. Sound practice, however, demands a clear distinction for the reader between news reports and opinion. Articles that contain opinion or personal interpretation should be clearly identified.

ARTICLE VI - Fair Play. Journalists should respect the rights of people involved in the news, observe the common standards of decency and stand accountable to the public for the fairness and accuracy of their news reports. Persons publicly accused should be given the earliest opportunity to respond. Pledges of confidentiality to news sources must be honored at all costs, and therefore should not be given lightly. Unless there is clear and pressing need to maintain confidences, sources of information should be identified.

13. As amended in 1986, the International Federation of Journalist (IFJ) <http://www.ifj.org/en/>, the world's longest running journalism organization, organized in 1954 as the World Congress of International Federation of Journalists,

provides the following principles, among others:

This International Declaration is proclaimed as a standard of professional conduct for journalists engaged in gathering, transmitting, disseminating and commenting on news and information in describing events.

1. Respect for truth and for the right of the public to truth is the first duty of the journalist
2. In pursuance of this duty, the journalist shall at all times defend the principles of freedom in the honest collection and publication of news, and of the right of fair comment and criticism
3. The journalist shall report only in accordance with facts of which he/she knows the origin. The journalist shall not suppress essential information or falsify documents.
4. The journalist shall use only fair methods to obtain news, photographs and documents.
5. The journalist shall do the utmost to rectify any published information which is found to be harmfully inaccurate.

\* \* \*

14. In the context of the underlying “reports,” minimal journalistic standards were not applied as defendants engaged in abject failure to interview Mrs. Lee or any other suspect; failed to review documents; failed to communicate with Mrs. Lee’s counsel, and other factors. Because of their gross, abject, malicious, bad faith failure, defendants are subject to punitive damages.

15. Each defendant committed the journalistic standards by committing the following acts of libel per se.

**DAILY MAIL**

16. Defendant DailyMail holds itself out as being owned by DMG Media Limited, Northcliffe House, 2 Derry Street, London W8 5TT. Registered in England and Wales, defendant DailyMail boasts readership in the United States exceeding 44 million unique visitors per month (as measured in October 2014) within the United States; and employs 200 employees in the United States; and generates 900 stories per day for its website. In one of its proprietary website pages, the following summary of a Wall Street Journal Online article is provided:

MailOnline, now one of the most-read newspaper websites in the USA, is renaming itself as DailyMail.com in order to make branding clearer to advertisers, says MailOnline publisher Martin Clarke. MailOnline has grown to employing more than 600 people around the world, 200 of whom are in the USA, collectively generating an average of 900 stories per day for the site. Growth of readership has been rapid, with the site now attracting 44.2m unique visitors in the USA in October of this year, driven by the appeal of its powerful aggregation and celebrity coverage.

<http://www.dmgmedia.co.uk/news/news-archive/id/1473/year/2014>

17. Defendants Jane Does and John Does 1-3 are employed by MailOnline and/or Daily Mail as a featured columnist/reporter for the website content published

on January 30, 2014 titled “Gang behind SuperBowl ‘party packs’ of prostitutes and drugs is arrested in days before the big game”.

18. On January 30, 2014, defendant DailyMail reported a false and defamatory story on its website at <http://www.dailymail.co.uk/news/article-2548750/Police-bust-pricey-drug-prostitution-ring-ahead-Super-Bowl.html>. See Exhibit 1. Defendant’s story stated:

- \* Gang behind Super Bowl ‘party packs’ of prostitutes and drugs is arrested days before the big game Attorney General's office announced massive prostitution ring bust that led to the arrest of 18 ‘operators’ after investigation that spanned 11 months

- \* The group was advertising ‘party packs’ with prostitute and drug combos

- \* Organizers texted clients and appealed to out-of-town visitors

- \* Second bust also happened Wednesday night with a group of prostitutes arrested just blocks from Super Bowl Boulevard last night





Naming names: Attorney General Eric Schneiderman showed the credit card and a poster with pictures of the prostitutes who took part in the 'party pack' deals where they sold and delivered both sex and drugs

Police have rounded up 18 operators of a prostitution ring being run in New York City because they were selling 'party packs' of cocaine and sex to high-end clients ahead of the Super Bowl.

Surveillance shows the ring laundered money and credit cards through clothing, wig, beauty supply and limousine businesses and targeted wealthy out-of-town customers, especially during large events.

Prostitutes would bring cocaine to clients who ordered the so-called party packs.

Scroll Down for Video

<http://www.dailymail.co.uk/news/article-2548750/Police-bust-pricey-drug-prostitution-ring-ahead-Super-Bowl.html>

19. Daily News defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

20. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

21. Because of defendants' acts, plaintiffs have been injured.

### **SEOUL NEWS**

22. Defendant Seoul News is a news company located at Taepyung-ro-1-ga, Chung-gu, Seoul, 100101, South Korea.

23. Defendants John Does and Jane Does 4-6 are reporters and employees of Seoul News and are believed to be responsible for contents of article "New York Koreans, caught 16, massive prostitution ring arrested 18 people" dated February 1, 2014.

24. On January 31, 2014, defendants published and disseminated "news" story

with a headline stating "New York Koreans, caught 16, massive prostitution ring arrested 18 people" on its website <http://www.seoul.co.kr/news/newsView.php?id=20140201500037>. The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 2), defendants published the following in essence:

A. Within the Koreatown of New York City in the United States, Koreans were operating an illegal sex and drug business, selling both sex and money at one stop, and they were involved in money laundering, shocking the community.

B. On the 31<sup>st</sup> (local time), according to American media, New York prosecutor's office and New York City police went to the populated Korean business area in Manhattan 34<sup>th</sup> Street's high rise apartment and urgently arrested Yoon (41, female), Cho (44, female) Chung (40, female) and others for operating a sex business along with a server, broker, drug dealer, all 18 were urgently arrested. Of these 16 are known to be Koreans.

C. This gang operated illegally, collected money and laundered the proceeds through cosmetics, wigs, clothes and taxi services. They used the internet

to disseminate their sex business advertisement to customers.

25. Seoul News defendants' publication of plaintiff's picture and remarks in a false and defamatory story have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

26. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

27. Because of defendants' acts, plaintiffs have been injured.



중년남 강남과  
대낮부터...출격!



말기암환자 47세  
죽기직전에 한말이

맨해튼 34번가의 고층 아파트 등을 급습해 윤모(41·여), 조모(44·여), 정모(40·여)씨 등 성매매 조직 운영자와 절대 여성, 브로커, 마약 중급책 등 18명을 긴급 체포했다. 이들 중 한인은 16명인 것으로 알려졌다.



▲ 뉴욕 수사당국의 수사결과 발표자료  
라디오코리아 제공

북한 김정은, 신발광장 시찰... "품질 높여라"  
크리스티나 밀리안, "노브라 패션..."  
가장 험리기 쉬운 패스워드 1위는? 지금 생각  
미달이 김정은, 파격 베드신 '상상초월 볼륨감'

#### 실시간 급상승 정보

more

로또 1등당첨자 '자통 안되는 이유 있더라'  
방송3사 출연 노종각 알고보니 억만장자?!  
당첨금 668억 1등 32명 모두 한곳에서 나와...

- 차 바꾸고 싶은데.. 내차 "팔면" 얼마?
- "다크써클, 눈밑지방" 절대 수술하지마세요 !!
- "아토피" 해결책 등장!! "병원업체 발각!!"
- "다크써클, 눈밑지방" 절대 수술하지마세요 !!
- <속보> 보험아줌마 '실비보험 들지마' 진짜 이유?
- 폐암 말기남 '죽음의 문턱'에서 구해낸 건...
- 배수인줄 알았는데.. 통장에 "44억!"
- 학벌 상관없이 "공무원" 될 수 있는 신의자력증?!

서울 Eye

오늘의포트 포털갤러리 Hot포트

**IMBC , INC., and MBC INC.**

28. Defendant IMBC, Inc., and MBC Inc., is a news company located at 255 Mapo-gu Sung-am-ro (Sang-an-dong Munhwa Bang Song Media Center 10F) Seoul, South Korea.

29. Lee Un Joo is a reporter/columnist believed to be citizen and domiciliary of South Korea and is believed to be employed by IMBC, Inc., and MBC Inc., who published the article and video “ New York Korean Prostitution Organization Busted...Even Selling Drugs” dated February 1, 2014.

30. Defendants John Does and Jane Does<sup>7-9</sup> are reporters and employees of IMBC, Inc., and MBC Inc., who are responsible for the content and the publication of the article and video with the headline “ New York Korean Prostitution Organization Busted...Even Selling Drugs” dated February 1, 2014.

31. On February 1, 2014, defendants published and disseminated “news” and video story with a headline “New York Korean Prostitution Organization Busted...Even Selling Drugs” on its website [http://imnews.imbc.com/replay/2014/nwtoday/article/3410586\\_13495.html](http://imnews.imbc.com/replay/2014/nwtoday/article/3410586_13495.html). The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season.



Specifically, in the online article (See Exhibit 3), defendants published the following in essence:

A. In the United States, within Manhattan's Korea town district, illegal sex and drug distribution gang operated by Koreans was busted.

B. U.S. New York prosecutor's office yesterday urgently arrested in the Manhattan business district at a high rise apartment, 41 years old Yoon, 44 years old Cho and others for gang operations of drug and sex trade. It was uncovered that the apartment where the sex trade operated was luxurious, and the gang provided customers who wanted illegal drugs as one stop service. In addition, outside of New York Manhattan at various other places this business operated, it was confirmed. . .

.



32. IMBC Inc., and MBC Inc., defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

33. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

34. Because of defendants' acts, plaintiffs have been injured.

#### **MUNHWAI.COM**

35. Defendant Munhwai.com is a news company located at 3815 100<sup>th</sup> Street, 8W, Lakewood, WA 98499.

36. Defendants John Does and Jane Does 10-12 are unknown individuals who are believed to have been employed by Munhwai.com writers/reporters responsible for the contents of that article published on February 1, 2014 titled "New York prosecutors, illegal drug sale and prostitution run by Korean crime ring, arrested 16 people shocking the community, estimated to have made \$3,000,000".

37. On February 1, 2014, defendants published and disseminated "news" story

with a headline “ New York prosecutors, illegal drug sale and prostitution run by Korean crime ring, arrested 16 people shocking the community, estimated to have made \$ 3 , 0 0 0 , 0 0 0 ” on its website <http://munhwai.com/news/view.html?section=306&category=364&no=6245>. The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 4), defendants published the following in essence:

A. Within the Korean town of New York City, operating an illegal sex business and drug parties, was a Korean sex business gang that was uncovered and is shocking the community.

B. New York prosecutor on the 30th at Manhattan 34<sup>th</sup> Street arrested Yoon(41, female), Cho (44, female) Chung (40, female) and others for operating a sex business along with a server, broker, drug dealer, 16 Koreans, total 18 were urgently arrested for selling drugs.

C. According to the complaint the sex trade operation’s address (990 6th Avenue) was a code for “990 Apartments” and Yoon, Chung and Cho and others divided their sex operation into 3 groups: Butterfly Group, Gold VIP Group, Jacky



Group, etc. These groups were used to operate the business and the manager used the internet and phones to manage and advertise to the customers.

D. It was uncovered that the sex business operated in Manhattan's Korea town, Long Island and Queens, and even Brooklyn and small businesses. The location 990 Apartment is a luxury place and party pay ("Party Pack") so-called sex and drugs package was served. . . .



뉴욕 맨해튼 한인타운을 근거지로 클럽 성매매 필라과 마약 파티를 벌여온 기업형 한인 매춘 조직이 적발돼 송징을 주고 있다.

38. Munhwa.com defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

39. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

40. Because of defendants' acts, plaintiffs have been injured.

#### **CHANNEL A, INC.**

41. Defendant Channel A, Inc., is a news company located at 1 Jong-no-gu, Chung-gae-chun-ro (110-715) Seoul, South Korea.

42. Defendants John Does and Jane Does 13-15 are reporters and employees of Channel A Inc., who published the article "Prostitution and Cocaine...New York Gang Arrested 18 People" dated February 1, 2014.

43. On February 1, 2014, defendants published and disseminated "news" and video story with a headline "Prostitution and Cocaine...New York Gang Arrested 18 P e o p l e " o n i t s w e b s i t e <http://news.ichannela.com/tv/totala/3/all/20140201/60510683/1>. The story falsely

and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season.

44. Channel A, Inc., defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

45. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

46. Because of defendants' acts, plaintiffs have been injured.

#### **SPORT-ALL KOREA**

47. Defendant Sport-All Korea is a news company located at 893 Jong-no-gu Sae-mun-an-ro #303, Seoul, South Korea.

48. Defendants John Does 16-19 are reporters and employees of Sport-All Korea who published the article "Korean Prostitution and cocaine party...Shocking New York", dated February 1, 2014.

49. On February 1, 2014, defendants published and disseminated "news" story



50. Sport-All Korea defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

51. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

52. Because of defendants' acts, plaintiffs have been injured.

#### **K - AMERICAN POST**

53. Defendant K - American Post is a news company located at 3835 Presidential Parkway, 200, Atlanta, Georgia.

54. Defendants John Does and Jane Does 20-22 are reporters and employees of K-American Post who published the article "Within Korean Society = Prostitution...5 More Arrested", dated February 3, 2014.

55. On February 3, 2014, defendants published and disseminated "news" story with a headline "Within Korean Society = Prostitution...5 More Arrested" on its website [http://www.kamerican.com/GNC/new/secondary\\_contents.php?article\\_no=5&no=](http://www.kamerican.com/GNC/new/secondary_contents.php?article_no=5&no=)



2697. The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. (See Exhibit 6)



56. K - American Post defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by

third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

57. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

58. Because of defendants' acts, plaintiffs have been injured.

### **YTN NEWS**

59. Defendant YTN News is a news company located at 121-904 Mapo-gu Sang-am-San-ro 76, Sang-an-dong, YTN Newsquare, Seoul, South Korea

60. Defendants John Does and Jane Does 23-25 are reporters and employees of YTN News who published the article and video with the headline dated January 31, 2014.

61. On January 31, 2014, defendants published and disseminated "news" story on its website [http://www.ytn.co.kr/\\_ln/0104\\_201402010613105968](http://www.ytn.co.kr/_ln/0104_201402010613105968). The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season.

62. YTN News defendants' publication of plaintiff's picture and remarks have

caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

63. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

64. Because of defendants' acts, plaintiffs have been injured.

### **MALAYSIA CHRONICLE**

65. Defendant Malaysia Chronicle is a news company located at PO Box 30485, Seven Mile Beach, Grand Cayman, Cayman Islands. In one of its proprietary website pages <http://310627192.r.worldcdn.net/images/stories/aboutus.jpg>, the following summary of Malaysia Chronicle is provided:

#### **ABOUT US**

Malaysia Chronicle was started on June 1, 2010, by a veteran journalist. The team of one has since been expanded to include other seasoned and well-known editors, writer and reporters. The goal of Malaysia Chronicle to become a successful and popular news media for the people. It will focus on Politics, with Business news also a core feature since the pulse of a nation is often its economy. And lest we forget and lose ourselves in the often too-engrossing world of power-politics and big-time



money, there is a lighter side to remind us of life's other dimension in Social.

Happy Reading!

66. Defendants John Does and Jane Does 26-29 are reporters and employees of Malaysia Chronicle who published the article ““ MAMA-SANS’ busted in high-priced hooker ring” dated January 31, 2014.

67. On January 31, 2014, defendants published and disseminated “news” story with a headline ““ MAMA-SANS’ busted in high-priced hooker ring” on its website [http://www.malaysia-chronicle.com/index.php?option=com\\_k2&view=item&id=221341:#axzz3Or9JFE4y\\_](http://www.malaysia-chronicle.com/index.php?option=com_k2&view=item&id=221341:#axzz3Or9JFE4y_) The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 7), defendants published the following:

A. “AUTHORITIES scored a touchdown early Thursday against a high-priced Asian prostitution ring that was hoping to score big bucks leading up to the Super Bowl.”

B. “Attorney General Eric Schneiderman’s investigators and the NYPD rounded up the operation’s madams and a pair of drug dealers who supplied the

hookers just days before the big game as tens of thousands of visitors flocked to the city.”

C. “And all of the women in custody were described as ‘managers’ of the ring and not street hookers themselves.”

D. “The ring allegedly used legitimate businesses including a limo service, clothing wholesaler and beauty supply company to launder money.”

E. “The ring lured johns with internet ads and even cable TV spots in addition to the racy texts.”

F. “Conversations caught on wiretaps revealed that the ring used code names for cocaine, including ‘party’, ‘jewellery’, ‘powder’, ‘make’ and ‘Soojaebi’, a Korean noodle soup.”

G. “Authorities said once a customer was zonked on booze or drugs, other hookers would flood his room, and the ring would bill the john’s credit card for \$10,000 or more for multiple dates.”

H. “Cops using a battering ram broke down the door of the building and busted several of the madams there early Wednesday.”

I. “At 8:15am. Thursday, a number of handcuffed, casually dressed Asian women were walked from the precinct to an unmarked blue police van for the trip to Manhattan Criminal Court for arraignment.”

J. “The women said nothing while covering their faces with fur-trimmed hoods and other clothing.”

K. “The other women arrested included Young Ok Tae, 38; Kyung Chun ‘Nicky’ Min, 33; Sun Lee ‘Sarah’ Ahn, 56; Young Mi ‘Jasmine Lee, 40; Ji Young ‘Ivy’ Moon, 40; Janice ‘Naomi’ Lee, 35; and Hee Jung ‘Leah’ Chern, 42.”

M. “Also, Haiming ‘Megan’ Quan, 41; Kyong Bin ‘Jackie’ Cho, 44; Jung Hee ‘Sara’ Jang, 43; In Suk ‘HyoJung’ Cho, 49; Ji Young ‘Jenny’ Lee, 34; Hada ‘Mia’ Jang, 26; Nine ‘Tina’ Kim, 31; and Hajoung ‘Dada’ Heath, 40.”

N. “The operation was based in Manhattan, but also served Brooklyn, Long Island, Queens and several other states.”

68. Malaysia Chronicles defendants’ publication of plaintiff’s name and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

69. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

70. Because of defendants' acts, plaintiffs have been injured.

### **HEADLINES 365**

71. Upon information and belief, defendant Headlines 365 is an online news company located at Scottsdale, Arizona. In one of its proprietary website pages [http://headlines365.com/?page\\_id=12783](http://headlines365.com/?page_id=12783), the following summary is provided:

Headlines 365 is a one of the largest online news reporting sites in the web that conveys news in different genres which include: Business, sports, technology, education, fashion, health, lifestyle, politics, science and world news in general. Headlines 365 is frequently updated to ensure that its viewers are ahead and up to date with what goes on around them and around the world. Headlines 365 also has an archive that makes it easier for its users to access past posted article in the genre they desire. The website is easy to navigate through and has a search bar where its users can easily search titles of news or articles. Headlines 365 has a Facebook and twitter page that allows its user s to be on track with the news and articles that are posted daily. In case of any queries the headlines 365 has FAQ options where the user can refer to previously asked question with solutions and get help. The site also has a top stories sections that displays the most recent and eye catching headlines that no one would ever want to miss.

#### **Goal of Headlines 365**

The major goal of Headlines 365 is to be one of the best news reporting websites in the world and provide accurate and up to date news to its viewers and on time.

### Objectives of Headlines 365

1. Provide information that is accurate and reliable to its viewers as it happens.
2. Build an information archive that will be accessible to people around the world.
3. Encourage its viewers to suggest any ideas and also contribute in the updating of the website by submitting articles for posting.
4. Act as a gateway where users can share information by posting articles about various educative topics, lifestyle or politics around the globe.
5. Provide timely information to newsreaders.

72. Defendants John Does and Jane Does 30-32 are reporters and employees of Headlines 365 who published the article “Drugs, sex ‘party - pack’ ring busted up” dated January 31, 2014.

73. On January 31, 2014, defendants published and disseminated “news” story with a headline “Drugs, sex ‘party - pack’ ring busted up” on its website <http://headlines365.com/?p=57196>. The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated

systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 7), defendants published the following:

A. “A sophisticated Manhattan-based prostitution ring that offered “one-stop shopping” and delivered both drugs and debauchery was sacked just days before the Super Bowl.”

B. ““Always a treat and always fast to your door,’ Asian Wave Escorts promised in sexy come-ons broadcast on public access TV, sources said.”

C. “The ring was headed by a middle-aged madam named Hyun Ok Yoonung, a 41-year-old Korean immigrant who officials said is something of a legend in the flesh-peddling business.”

D. “RELATED: MOMS TRIES TO PIMP OUT DAUGHTER, 15, FOR SUPER BOWL”

E. Several of the alleged hookers were nabbed when police used battering rams to burst into an apartment at 990 Sixth Ave. that is just blocks away from “Super Bowl Boulevard.”

F. “The women, who also were mostly from Korea, serviced their johns in the single bedroom, where cocaine, crack pipes and Viagra was found, officials said.

G. “One of the tenants in the Sixth Ave. building is The King’s College, a Christian undergraduate university that houses some of its students there — and

which had no idea it was a den of sin.”

H. “RELATED: NYPD NABS 87 JOHNS IN CITYWIDE CRACKDOWN ON PROSTITUTION”

I. “More ‘girls’ were operating from an apartment at 207 E. 37th St., police said. And the nerve center of the operation was another pad at 148 E. 30th St.

This was one of the advertisements promoting Asian Wave Escorts, which offered drugs on top of sex.”

J. “The prostitutes identified in court papers were no spring chickens. They ranged in age from 26 to 56 and four of them were in their 40s.”

K. “They also weren’t just turning trucks. Sun Lee Ahn, the 56-year-old police dubbed Sarah, also allegedly booked dates and ferried drugs, sources said.”

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**Headlines 365**  
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**BREAKING NEWS** → Kurt Cobain's suicide note printed on tank tops, T-shirts → 'Fresh Off the Boat' author explains controversial comment → Henry in for Elliott, New Zealand bat → Henry's V8

**Drugs, sex 'party-pack' ring busted up**  
Posted On 31 Jan 2014 By : admin Comments: 0

A sophisticated Manhattan-based prostitution ring that offered "one-stop shopping" and delivered both drugs and debauchery was sacked just days before the Super Bowl.

"Always a treat and always fast to your door," Asian Wave Escorts promised in sexy come-ons broadcast on public access TV, sources said.

The ring was headed by a middle-aged madam named Hyun Ok Yoonung, a 41-year-old Korean immigrant who officials said is something of a legend in the flesh-peddling business.

"She was really the leader," Attorney General Eric Schneiderman said Thursday. "This is someone we've heard of from other criminals, really sort of admiring the scope of her enterprises. She's well known in this industry."

Codenamed "Beige," the madam was arrested at her Long Island home while police were rounding up the 17 other alleged members of the ring in overnight raids.

**OPERATION OUT OF BOUNDS**

Diagram showing the hierarchy of the ring, with 'Yong Lee' and 'Joseph Lee' at the center, surrounded by 17 other alleged members. The diagram also lists names like 'Kurt Cobain', 'Henry in for Elliott', 'Change or die: the ultimate choice for England's T20', and 'England's T20: facts and fiction'.

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**Henry in for Elliott, New Zealand bat**  
Posted On 15 Jan 2015

**Change or die: the ultimate choice for England's T20**  
Posted On 14 Jan 2015

**England's T20: facts and fiction**  
Posted On 14 Jan 2015

banner banner  
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This was one of the advertisements promoting Asian Wave Escorts, which offered drugs on top of sex.

74. Headlines 365 defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

75. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

76. Because of defendants' acts, plaintiffs have been injured.



## **PAGESAY.COM**

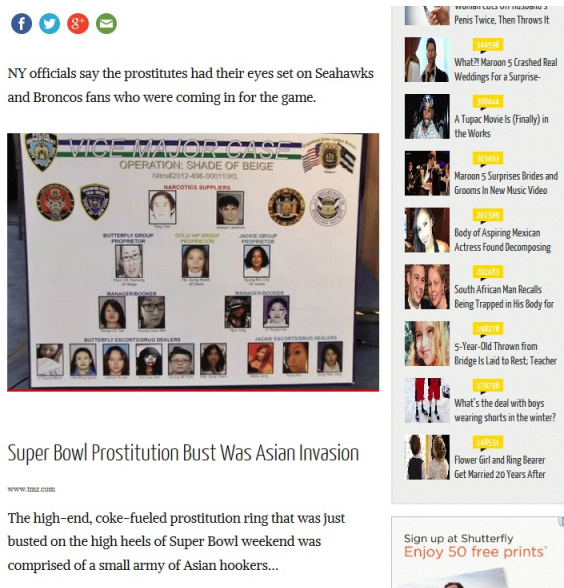
77. Defendant Pagesay.com is an online news company located at No.9., Lance 169, Jiabei Street, Chiayi, Namibia.

78. Defendants John Does and Jane Does 33-35 are reporters and employees of Pagesay.com who published the article “Drugs, sex ‘party - pack’ ring busted up” dated January 31, 2014.

79. On January 30, 2014, defendants published and disseminated “news” story with a headline “Super Bowl Prostitution Bust Was Asian Invasion” on its website <http://pagesay.com/super-bowl-prostitution-bust-was-asian-invasion/>. The story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 8), defendants published the following:

A. “NY officials say the prostitutes had their eyes set on Seahawks and Broncos fans who were coming in for the game.”

B. “The high-end, coke-fueled prostitution ring that was just busted on the high heels of Super Bowl weekend was comprised of a small army of Asian hookers...”



80. Pagesay.com defendants' publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

81. Because of Pagesay defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

82. Because of defendants' acts, plaintiffs have been injured.

## **CLAIMS FOR RELIEF**

### **Count One — Libel**

83. Plaintiffs incorporate the foregoing allegations by reference.

84. By reason thereof, defendants and each of them committed libel with each false article published about the plaintiff Janice Lee. Plaintiffs have sustained significant injury.

### **Count Two — Libel Per Se**

85. Plaintiffs incorporate the foregoing allegations by reference.

86. By reason thereof, defendants and each of them committed libel per se with each false article published about the plaintiff Janice Lee. Plaintiffs have sustained significant injury.

### **Count Three — Negligent, Reckless & Intentional**

#### **Infliction of Emotional Distress**

87. Plaintiffs incorporate the foregoing allegations by reference.

88. Defendants acted negligently, recklessly, or intentionally in publishing the false and defamatory story of Mrs. Lee and thereby caused emotional distress against her and her immediate family members, all of the plaintiffs. Defendants were under a duty to fact-check and report accurate facts and do to so by remaining objective and not merely validating and rubber-stamping the bald, false allegations uttered by police

and other government officials. Defendants breached this duty knowingly, intentionally, negligently or recklessly, and caused each plaintiff foreseeable harm.

WHEREFORE, plaintiffs demand:

- A. Compensatory damages in the amount to be determined by a jury;
- B. Punitive damages in an amount to be determined by a jury;
- C. Fees and costs of this action;
- D. Injunction requiring defendants to collect and delete the defamatory postings, and replace them with clarification and retractions;
- E. Any other relief this Court deems just and proper.

**JURY DEMAND**

Plaintiffs request a trial by jury pursuant to Federal Civil Rule 38.

Dated: January 22, 2015

/s/ Michael S. Kimm  
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Sung H. Jang, Esq.  
Kimm Law Firm  
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